UNITED STATES DISTRICT COURT DISTRICT OF MINNESOTA

United States of America,

Plaintiff,

Case No. 0:10-CR-32 (01) JNE/SRN

v.

Dennis E. Hecker,

Defendant.

DEFENDANT'S MOTION FOR DISCLOSURE OF GOVERNMENT WITNESSES

Defendant DENNIS E. HECKER, by and through his attorney, Brian N. Toder, hereby moves that the Court pursuant to Rule 16 of the Federal Rules of Criminal Procedure, for an order requiring the government to provide, at a minimum of 60 days before trial, a list of witnesses they intend to call at trial.

This motion is based upon the indictment, the records and files in the above entitled action, the memorandum filed herewith, and any and all other matters which may be present prior to or at the time of the hearing of said motion.

Respectfully submitted,

Dated: June 8, 2010 CHESTNUT CAMBRONNE PA

By <u>/s/ Brian N. Toder</u>

Brian N. Toder, #17869X 17 Washington Avenue North Suite 300

Minneapolis, MN 55401 (612) 339-7300 Fax (612) 336-2940

Barbara J. May, #129689 2780 N. Snelling Ave. Suite 102 Roseville, MN 55113 (651) 486-8887 Fax (651) 486-8890

ATTORNEYS FOR DEFENDANT